

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

DANIEL PALOMO OF UTILITIES ANALYSES, INC.
ON BEHALF OF KENTUCKY STATE UNIVERSITY

COMPLAINANT

v.

BELLSOUTH TELECOMMUNICATIONS, INC.

DEFENDANT

CASE NO. 95-486

ORDER TO SATISFY OR ANSWER

BellSouth Telecommunications, Inc. ("BellSouth") is hereby notified that it has been named as defendant in a formal complaint filed on October 25, 1995, a copy of which is attached hereto.

Pursuant to 807 KAR 5:001, Section 12, BellSouth is HEREBY ORDERED to satisfy the matters complained of or file a written answer to the complaint within 10 days from the date of service of this Order.

Should documents of any kind be filed with the Commission in the course of this proceeding, the documents shall also be served on all parties of record.

Done at Frankfort, Kentucky, this 20th day of November, 1995.

ATTEST:


Executive Director

PUBLIC SERVICE COMMISSION


Chairman


Vice Chairman


Commissioner

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 25 1995

PUBLIC SERVICE
COMMISSION

In the Matter of:

DANIEL PALOMO of UTILITIES ANALYSES, Inc. (UAI)
on behalf of KENTUCKY STATE UNIVERSITY (KSU)

(Your Full Name)

COMPLAINANT

VS.

BELL SOUTH

(Name of Utility)

DEPENDANT

25-486

C O M P L A I N T

The complaint of DANIEL PALOMO of UAI on behalf of KSU respectfully shows:
(Your Full Name)

(a) Daniel Palomo of Utilities Analyses, Inc
(Your Full Name)

Post Office Drawer 450968 Atlanta, Georgia 31145
(Your Address)

(b) Bell South
(Name of Utility)

Post Office Box 32410 Louisville Kentucky 40232
(Address of Utility)

(c) **That:** Bell South has not issued full credit for nine lines which were being
(Describe here, attaching additional sheets if

billed without Kentucky State University having access to them. Full details
necessary, the specific act, fully and clearly, or facts

are outlined in the attached letter dated June 6, 1995 to the Public Service
that are the reason and basis for the complaint.)

Commission and the letter dated April 10, 1995 to Ms Curtis.

Formal Complaint

Daniel Palomo of Utilities Analyses (UAI)

on behalf of Kentucky State (KSU)VS

Bell South

(Your Name)

(Utility Name)

Page 2

Wherefore, complainant asks that a credit/refund be issued for the
(Specifically state the

amount paid to Bell South for the lines in question, using the last date of
relief desired.)

usage or order activity. And not a date deemed adequate by Bell South.

Dated at Parlin, New Jersey, Kentucky, this 10 day
(Your City)

of October, 1995.
(Month)


(Your Signature)

(Name and address of attorney, if any)

Section 15. Forms. (1) In all practice before the commission the following forms shall be followed insofar as practicable:

- (a) Formal complaint.
 - (b) Answer.
 - (c) Application.
 - (d) Notice of adjustment of rates.
- (2) Forms of formal complaint.

Before the Public Service Commission

(Insert name of)
complainant))

COMPLAINANT)

No.)

Daniel Palomo of vs. Bell South)
Utilities Analyses, Inc. (UAI))
on behalf of Kentucky State U. (KSU))

(To be inserted
by the secretary)

(Insert name of each)
defendant))

DEFENDANT)

COMPLAINT

The complaint of (here insert full name of each complainant) respectfully shows:

(a) That (here state name, occupation and post office address of each complainant).

(b) That (here insert full name, occupation and post office address of each defendant).

(c) That (here insert fully and clearly the specific act or thing complained of, such facts as are necessary to give a full understanding of the situation, and the law, order, or rule, and the section or sections thereof, of which a violation is claimed).

WHEREFORE, complainant asks (here state specifically the relief desired).
That correct credit be given for nine lines billed.

Dated at Parlin, NJ, Kentucky, this 19
av of October 1995.

Daniel Palomo of UAI on behalf of KSU

(Name of each complainant)

(Name and address of attorney, if any)

(3) Form of answer to formal complaint.

Before the Public Service Commission

(Insert name of
complainant))

COMPLAINANT)

No.)

Daniel Palomovs. Bell South)
of UAI on behalf)
of KSU)

(To be inserted
by the secretary)

(Insert name of each
defendant))

DEFENDANT)

ANSWER

The above-named defendant, for answer to the
complaint in the proceeding, respectfully states:

That (here follow specific denials of such
material, allegations as are controverted by the
defendant and also a statement of any new matter
constituting a defense. Continue lettering each
succeeding paragraph).

WHEREFORE, the defendant prays that the
complaint be dismissed (or other appropriate
prayer).

Bell South

(Name of defendant)

(Name and address of attorney, if any)

UTILITIES ANALYSES, INC.

404 321 6677

POST OFFICE DRAWER 460666

ATLANTA, GEORGIA 31148

FACSIMILE 404 321 6766

DAN PALOMO 908-727-1726 FAX 908-727-8433

April 10, 1995

Ms Evvy Curtis
South Central Bell

Re: Kentucky State University
502-223-4464
502-223-5898
502-223-8359

Dear Ms Curtis;

During our telephone conversation on 4/5/95 I mentioned I was currently doing a physical inventory of Kentucky State University's (KSU) telephone system. The three main numbers above have a total of nine lines all of which were found with NO Bell demarcation (RJ) point. I was able to trace the dial tone for the lines up to a telephone closet on the third floor of the J. Carroll building (room 323 closet 322). The lines are on house blocks no longer used for live lines. I am asking that Bell show KSU where these lines are working on a verified Bell demarcation point.

I have listed some of my findings that may help in your investigation. Mr. Mike Fitzpatrick, the full time ROLM technician, has confirmed my findings. If you have any questions or would like to discuss anything please feel free to contact me at 908-727-1726. Thank you for your time and cooperation..

Sincerely,



Dan Palomo

- 1) All nine lines show installed around 12/83 and are ring no answer
- 2) Five of the lines are billed for CBT05's, obsolete data interfaces, which have not been used by KSU since 1987, per Ray W. manager of the KSU data center.
- 3) A search of the data center (even the raised floor area) found no trace of these lines. Ray W. confirmed these lines not working on any equipment since he has been there (1987).
- 4) ROLM has been in charge of all on campus telecommunications since they put in their system 1984 and all in house wiring. NO records of these numbers exist.
- 5) KSU comptroller, Ms Black has no records of these numbers.

COPY

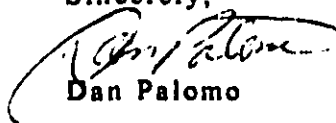
page 2

The factors that point to these lines not working for KSU longer than the one year period of time are:

- a) all lines went in 12/30/83 so it appears they were being used for the same purpose, and all lines were found on the original abandoned Bell cable going to the third floor.
- b) five of the nine have CBT's billed to them (obsolete data interfaces) and not used by KSU since 1987.
- c) no activity on any of the accounts since at least 1992 per South Central Bell's own records, that was only to add these to a summary bill.
- d) no, RJ or CBT's were found and no house wire other than Bells old original cables were found on these lines.
- e) Bell technicians were the only ones to work on the original cables all working lines were put on RJ-21X's for ROLM to connect in house.

I would appreciate you checking into this matter. If you have any questions or wish to get in touch with me please feel free to call me at 908-727-1726. Thank you for your time and cooperation.

Sincerely,



Dan Palomo

UTILITIES ANALYSES, INC.

404 521 6677

POST OFFICE DRAWER 480668
ATLANTA, GEORGIA 31148

FACSIMILE 404 521 6708

June 2, 1995

Mr. Don Mill
Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort KY 40602

Re: Kentucky State University

Dear Mr. Mill:

I am asking that the Public Service Commission look into a decision made by South Central Bell to issue credit for only one year. The credit is related to nine lines (see attached CSR's) that were not found working on any demarcation point or at any customer equipment, by South Central Bell's technician.

I have placed all of the facts in sequential order so that it will be easier to follow.

- 1) the original inquiry was sent to Ms Evvy Curtis of South Central Bell on April 10, 1995 (see the attached letter).
- 2) during my telephone conversations with Ms Curtis I learned that these accounts had no activity for many years. In fact the last account to show any activity was 502-223-4464 and that was on 6/04/92, when this and all other accounts were summary billed.
- 3) on 4/25/95 it was decided that a Bell technician would do a physical inventory.
- 4) my call to Ms Curtis on May 2, 1995, found that the technician had gone out and could not find any of the nine lines on a demarcation point nor could he find any trace of them working (five of the lines are still being billed for CBT02/05's). At that time Ms Curtis informed me that she had talked to Ms Sharon Black, comptroller of KSU, and that she had agreed to a one year credit. Ms Curtis also informed me that it was policy for only six months credit to be given in these situations.
- 5) On 5/03/95 Ms Black informed me that she was under the impression that only six months was what Bell was required to give credit for, and that the one year given was extra.
- 6) A twelve month credit appeared on the May 04, 1995 main bill for all nine lines.

The factors that point to these lines not working for KSU longer than the one year period of time are:

- a) all lines went in 12/30/83 so it appears they were being used for the same purpose, and all lines were found on the original abandoned Bell cable going to the third floor.
- b) five of the nine have CBT's billed to them (obsolete data interfaces) and not used by KSU since 1987.
- c) no activity on any of the accounts since at least 1992 per South Central Bell's own records, that was only to add these to a summary bill.
- d) no, RJ or CBT's were found and no house wire other than Bells old original cables were found on these lines.
- e) Bell technicians were the only ones to work on the original cables all working lines were put on RJ-21X's for ROLM to connect in house.

I would appreciate you checking into this matter. If you have any questions or wish to get in touch with me please feel free to call me at 908-727-1726. Thank you for your time and cooperation.

Sincerely,



Dan Palomo

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE

(SVC CDR 21)
 NP (HUN-PUB) KENTUCKY, STATE
 UNIVERSITY/DCN NONE
 LA 0 1 MAIN ST
 SA 0 1 MAIN ST
 J FRANKFORT
 LOC DES (J CARROLL ACDCM SV)
 DZIP 40601
 YPH NONE
 SIC 8021
 AMN 96
 ZAEC K1502

---DIR
 DEL AG, BG, CG, DG, EG

---BILL
 BN1 KY STATE UNIV
 BA2 E MAIN ACADMC SVC BL
 BA3 X DONALD BUTERA
 PO 40601
 TAX 0000
 TAN 000,037
 PACI KKKK
 BTH 502 227-6000-038
 MAN 00030
 TFA ST
 SS (1) 000-00-0000

HTD ---SSE
 A 8359, 2994, 4412, 4426

(CHARGEABLE LISTINGS)

123083 NON	1 NPA	NR
021006 NON 2232994	1 1FB /TN 223-2994/TBE A/PIC 0288	33.35
123083 NON	1 TTB /TN 223-2994	3.00
061141 200	1 AHBKC /TN 223-2994/TBE A	0.05
123083 NON	1 HJ11C /TN 223-2994	NR
061584 200	1 9ZR /TN 223-2994/TBE A	6.00
021006 NON 2234412	1 1FB /TN 223-4412/TBE A/PIC 0288	33.35
123083 NON	1 TTB /TN 223-4412	3.00
061141 200	1 AHBKC /TN 223-4412/TBE A	0.05
123083 NON	1 HJ11C /TN 223-4412	NR
061584 200	1 9ZR /TN 223-4412/TBE A	6.00
021006 NON 2234426	1 1FB /TN 223-4426/TBE A/PIC 0288	33.35
123083 NON	1 TTB /TN 223-4426	3.00

CUSTOMER SERVICE RECORD

EFF DATE TAX IDENT NUMBER KS NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE		
061141 200	1 AHBKC /TN 223-4426/TBE A	0.05
123083 NON	1 HJ11C /TN 223-4426	NR
061584 200	1 9ZR /TN 223-4426/TBE A	6.00
020786 NON	1 1FB /TN 223-8359/TBE A/PIC 0288	33.35
061141 200	1 AHBKC /TN 223-8359/TBE A	0.05
123083 NON	1 HJ11C /TN 223-8359	NR
061584 200	1 9ZR /TN 223-8359/TBE A	6.00
123083 NON	1 TTB	3.00
123083 NON	4 CBT02	27.60
011584 NON	4 HTD	73.36

ORDER ACTIVITY

ORDER NO	COMPLETED SERIAL NO	POSTED CYCLE	REASON
2KBD0115BB	03-01-95 953850/BB011	03-02-95 3850	
BONEL 11-	03-01-95 YJTKMPD	03-01-95 R	
502238359HC	02-06-95 RATECHANGE	02-19-95	

---RMKS

RMKH (A) PCL 1TH, 06-04-92, AMN L
 EADS, 502 227-6000

LOCAL SVC BILLED ELSEWHERE

ATTCON LOCAL SVC	270.56
INTERSTATE CALC	0.00
SOUTH CENTRAL BELL LOCAL SVC	24.00
BILLED LOCAL SERVICE	24.00CR
	0.00

CUSTOMER SERVICE RECORD

EXCH
FRFTCI SVC
1FBSVC ESTB.
12-30-83PRINTED
02-28-95

SLA

DPA

PAGE PF
0001MPA CO LINE CUST
502 224-5098 229

EFF DATE	TAX	IDENT NUMBER	KS NO.	QUAN	USOC	DESCRIPTION OF SERVICE ON EQUIPMENT	NTC	TOTAL REVENUE
					(SVC CODE 81)			
					NP	(NON-FUN) KENTUCKY STATE		
					LA	UNIVERSITY/DON NONE		
					SA	8 E MAIN ST		
						8 E MAIN ST		
						FRANKFORT		
					LOC	DFS (HOME HALL MONTH)		
					DZIF	40601		
					YFH	NONE		
					SIC	8221		
					AIN	46		
					ZABC	NID02		

---DIR

DEL A0, B0, C0, D0, E0

---BILL

HNA KY STATE UNIV
 BAC 8 MAIN ACADMC SVC BL
 BAS 7 DONALD BUTERA
 PO 40601
 TAX 0000
 TAN 000/037
 PAC1 XXXX
 NTM 002 227-6000-020
 NAM 20000
 IYA 51
 SS (1) 000-00-0000

---SEE

123083 NON

1 NPS

(CHANGEABLE LISTINGS)

NR

020786 NON

1 IFB

(LINES & STATIONS)
 /TN 225-5098/105 A/PIC 0208
 /LPS/NNC/PCA BL, 01-27-86

55.51

062141 200

1 ANKNC

/TN 225-5098

0.0

123083 N00

1 RJ11C

/TN 225-5098

0.0

052484 200

1 97M

/TN 225-5098

0.0

123083 NON

1 TTB

0.0

123083 NON

1 CBT08

0.0

ORDER ACTIVITY

ORDER NO	COMP	IFB	SERIAL NO	POSTED	CYCLE	REASON
ZR00010500	02-01-95	463850/00010	02-02-95	0000		
000011-	03-01-95	711MFD	03-01-95	N		
5022255098NC	02-06-95	DATECHANGE	02-19-96			

CUSTOMER SERVICE RECORD

EXCH
FRFTCI SVC
1FBSVC ESTB.
12-30-83PRINTED
02-28-95

SLA

DPA

PAGE PF
0002MPA CO LINE CUST
502 224-5098 229

EFF DATE	TAX	IDENT NUMBER	KS NO.	QUAN	USOC	DESCRIPTION OF SERVICE ON EQUIPMENT	NTC	TOTAL REVENUE
						8400, 502 227-6000		
						LOCAL SVC BILLED ELSEWHERE		49.2
						ATTICOM LOCAL SVC		0.0
						INTERSTATE CALC		0.0
						SOUTH CENTRAL NFII (LOCAL SVC		0.0
						BILLED LOCAL SERVICE		0.0

EFF DATE TAX IDENT NUMBER KG NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE
(SVC CDF 31)
NP (NON-PUB) KENTUCKY STATE
UNIVERSITY/OGM NONE
1A 0 E MAIN ST
SA 0 E MAIN ST
FRANKFORT
LOC OFS (J CARROLL ACDCM SV)
DZIP 40601
YPH NONE
SIC 8221
AIM 44
ZAEK K1602

---DIR
DEL A0, B0, C0, D0, E0

---BILL
BN1 KY STATE UNIV
BA2 E MAIN ACDCM SVC HL
BAS X DONALD BUTERA
PO 40601
TAX 0NN0
TAR 000,837
PACI XXXX
BTM 502 227-6000-030
MAN 20030
TYA ST
GS (1) 000-00-0000

HTO ---SEE
A 4464, 4471, 4478, 4487

123003 NON	1 NP3	(CHARGEABLE LISTINGS)	NR
012406 NON	1 1FB	(LINES & STATIONS) /TN 223-4464/TBE A/PIC 0288 /HTG A/MMC/PCA BL, 01-14-86	33.35
123004 NON	1 YTB	/TN 223-4464	3.00
062191 200	1 AH8KC	/TN 223-4464/TBE A	.05
123005 NON	1 RJ11C	/TN 223-4464	NR
062604 200	1 9ZR	/TN 223-4464/TBE A	6.00
123006 NON	1 ITB	/TN 223-4471/TBE A/PIC 0288 /HTG A/MMC/PCA BL, 01-14-86	33.35
062191 200	1 YTB	/TN 223-4471	3.00
123007 NON	1 AH8KC	/TN 223-4471/TBE A	.05
062604 200	1 RJ11C	/TN 223-4471	NR
012406 NON 2234471	1 9ZR	/TN 223-4471/TBE A	6.00
123008 NON	1 1FB	/TN 223-4478/TBE A/PIC 0288	33.35

CUSTOMER SERVICE RECORD

EXCH CL SVC SVC ESTB. PRINTED SLA DPA PAGE PF NPA CO LINE CUST
FNFT 1FN 12-30-83 02-28-96 0002 502 223-4464 315

EFF DATE TAX IDENT NUMBER KG NO. QUAN USOC DESCRIPTION OF SERVICE OR EQUIPMENT BTC TOTAL REVENUE			
123004 NON	1 YTB	/HTG A/MMC/PCA BL, 01-14-86 /TN 223-4478	3.00
062191 200	1 AH8KC	/TN 223-4478/TBE A	.05
123005 NON	1 RJ11C	/TN 223-4478	NR
062604 200	1 9ZR	/TN 223-4478/TBE A	6.00
012406 NON 2234487	1 1FB	/TN 223-4487/TBE A/PIC 0288 /HTG A/MMC/PCA BL, 01-14-86	33.35
123006 NON	1 ITB	/TN 223-4487	3.00
062191 200	1 AH8KC	/TN 223-4487/TBE A	.05
123007 NON	1 RJ11C	/TN 223-4487	NR
062604 200	1 9ZR	/TN 223-4487/TBE A	6.00

ORDER ACTIVITY

ORDER NO	COMPLETED	SERIAL NO	POSTED	CYCLE	REASON
7KMH0044HB	03-01-95	463050/BR004	03-02-95	3860	
ZKUB00050M	03-01-95	463050/BR008	03-02-95	3860	
BOMEL 11-	03-01-95	YJTKRFD	03-01-95	R	
BOMEL 11-	03-01-95	YJTKRFD	03-01-95	R	
5022234404KC	02-06-95	NA1ECHANGE	02-19-95		

---RMKS
RMKX (A) PCL LTR, 06-04-92, ANN L
EADS, 502 227-6000

LOCAL SVC BILLED ELSEWHERE

ATTCOM LOCAL SVC	245.96
INTERSTATE CALC	0.00
SOUTH CENTRAL BELL LOCAL SVC	24.80
BILLED LOCAL SERVICE	24.80CR
	0.00



Kentucky State University Frankfort, Kentucky 40601

January 30, 1995

**South Central Bell
P.O.Box 66002
New Orleans LA
70166-6002**

To Whom It May Concern:

We have engaged Utilities Analyses, Inc., as telecommunications consultants.

South Central Bell is authorized and requested to respond to Mr. Daniel "Dan" G. Palomo in all matters pertaining to our telephone accounts. You are authorized to deliver to Mr. Palomo any requested billing records, equipment & service records, order activity reports and any other matters or information pertaining to the investigation of our telephone accounts.

This letter of authorization is valid for all our locations until further written notification.

Very truly yours,

Sharon Black

**Acting Comptroller
Kentucky State University**

**cc: Mr. Daniel "Dan" G. Palomo
Telecommunications Analyst
Utilities Analyses, Inc.
Post Office Drawer 480968
Atlanta, GA 31145**